

EXHIBIT A

Subject: FWC - Challenge (8) to "Confidential" Designations
Date: Monday, September 11, 2023 at 9:30:13 AM Eastern Daylight Time
From: Corey Stern
To: Michael A. Olsen, Jim Campbell
CC: Melanie Daly, Ted Leopold, Jordan Connors, Steve Morrissey, Paul Novak, Hunter Shkolnik, Patrick Lanciotti, Hunter Shkolnik, Richard Kuhl, Margaret Bettenhausen, TMendel, Bill Kim, Sheldon Klein, Rick Berg, Wayne B. Mason, David C. Kent, Philip Erickson, Susan Smith, Brian MacDonald, Todd Weglarz, Donald Dawson, Michael L. Williams, Eric A. Rey, Alaina Devine, Kristin M. Dupre, Richard P. Campbell, Andreas Ringstad, Jack J. O'Donnell, John R. Penhallegon, Chris Muha, Christopher R. Howe, Christopher D. Fletcher, William C. Cahill, Kelly Kramer, Kristin Silverman, Mark Ter Molen, William Sinnott, Minh Olivier Nguyen-Dang, Chris Weld, Thompson, Craig S., travis.gamble@faegredrinker.com, vance.wittie@faegredrinker.com, Moshe S. Maimon, Jerome Block, Kiersten Holms

Attachments: 2023.09.11 Letter to Veolia (8th Confidential Designations).pdf

Counsel for Veolia:

See correspondence attached.

Very Truly Yours,

Corey M. Stern
Levy Konigsberg, LLP
605 Third Avenue, 33rd Floor
New York, New York 10158
(212)605-6298
(212)605-6290 (facsimile)
www.levylaw.com

LEVY KONIGSBERG LLP
ATTORNEYS AT LAW
605 THIRD AVENUE, 33RD FLOOR
NEW YORK, NY 10158

NEW JERSEY OFFICE
QUAKERBRIDGE EXECUTIVE OFFICE
101 GROVERS MILL ROAD
LAWRENCEVILLE, NJ 08648
TELEPHONE: (609) 720-0400
FAX: (609) 720-0457

(212) 605-6200
FAX: (212) 605-6290
WWW.LEVYLAW.COM

ALBANY OFFICE
90 STATE STREET
ALBANY, NY 12207
TELEPHONE: (518) 286-5068

Writer's Direct Email: cstern@levylaw.com

September 11, 2023

VIA EMAIL & CERTIFIED MAIL (RRR)

James Campbell, Esq.
Campbell Conroy & O'Neil, P.C.
200 City Square, Suite 300
Boston, MA 02129

Michael A. Olsen, Esq.
Mayer Brown, LLP
71 South Wacker Drive
Chicago, IL 60606

RE: IN RE FLINT WATER CASES – PRODUCTION OF DOCUMENTS
CHALLENGE (8) TO “CONFIDENTIAL” DESIGNATIONS

Mr. Campbell, Mr. Olsen:

Please be advised that pursuant to the Court's Confidentiality Order,¹ Plaintiffs hereby formally challenge the "Confidential," "Highly Confidential," and/or "Highly Confidential – Attorneys' Eyes Only" designations of the following documents:²

1. VWNAOS555522-
VWNAOS555522.0001
2. VWNAOS254034-
VWNAOS254034.0004
3. VWNAOS537544-
VWNAOS537544.0002
4. VWNAOS526905-
VWNAOS526905.0002
5. VWNAOS528168-
VWNAOS528168.0008
6. VWNAOS528207-
VWNAOS528207.0010

¹ See Case No. 16-cv-10444 (ECF. No. 1255-3).

² Some documents/groups of documents appear to be duplicative but were produced numerous times with varying Bates numbers.

7. VWNAOS190783-
VWNAOS190783.0005
8. VWNAOS528288-
VWNAOS528288.0001
9. VWNAOS528228-
VWNAOS528228.0002
10. VWNAOS189785-
VWNAOS189785.0001
11. VWNAOS528229-
VWNAOS528229.0002
12. VWNAOS528165-
VWNAOS528165.0004
13. VWNAOS528602-
VWNAOS528602.0001
14. VWNAOS248946-
VWNAOS248946.0011
15. VWNAOS249107-
VWNAOS249107.0008
16. VWNAOS528155-
VWNAOS528155.0001
17. VWNAOS249167-
VWNAOS249167.0020
18. VWNAOS254021-
VWNAOS254021.0004
19. VWNAOS249162-
VWNAOS249162.0003
20. VWNAOS527011-
VWNAOS527011.0001
21. VWNAOS526982-
VWNAOS526982.0001
22. VWNAOS528589-
VWNAOS528589.0001
23. VWNAOS528601-
VWNAOS528601.0003
24. VWNAOS528597-
VWNAOS528597.0003
25. VWNAOS311336-
VWNAOS311336.0002
26. VWNAOS219539-
VWNAOS219539.0001
27. VWNAOS528302-
VWNAOS528302.0002
28. VWNAOS528281-
VWNAOS528281.0002
29. VWNAOS528577-
VWNAOS528577.0001
30. VWNAOS528563-
VWNAOS528563.0001

31. VWNAOS527039-
VWNAOS527039.0003
32. VWNAOS528580-
VWNAOS528580.0010
33. VWNAOS190634-
VWNAOS190634.0004
34. VWNAOS190678-
VWNAOS190678.0004
35. VWNAOS527059-
VWNAOS527059.0001

These documents do not contain private, non-public, confidential, competitively sensitive, or proprietary information not readily ascertainable through lawful means by the public. Furthermore, if any of these documents were to be made public, such would not cause oppression, competitive disadvantage, infringement of privacy rights established by statute or regulation, or infringement of confidentiality requirements established by statute or regulation with respect to government purchasing or other operations.

This letter is a formal demand to withdraw all such designations **and to reproduce each document without any redactions**, whether noted herein or not.

Very Truly Yours,

LEVY KONIGSBERG, LLP



Corey M. Stern

Cc: (By email only)
Theodore Leopold & Jordan Connors (Class Counsel)
Hunter Shkolsnik & Patrick Lanciotti (Co-Liaison Counsel)
Richard Kull & Margaret Bettenhausen (Counsel for the State)
William Kim & Sheldon Klein (Counsel for the City of Flint)
Wayne Mason & David Kent (Counsel for LAN/LAD)
Craig Thompson (Counsel for Rowe)
Susan Smith & Brian MacDonald (Counsel for McLaren)
Todd Weglarz & Donald Dawson (Counsel for certain Legionella Plaintiffs)
Michael Williams & Eric Rey (Counsel for the USEPA)
All Veolia Entities' Counsel of Record or otherwise known